

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20341-ALTMAN(s)

18 U.S.C. § 373
18 U.S.C. § 2261A(1)
18 U.S.C. § 924(o)
18 U.S.C. § 924(c)(1)(A)(iii)
18 U.S.C. § 1958(a)
18 U.S.C. § 1512(b)(3)
18 U.S.C. § 1503(a)
18 U.S.C. § 924(d)(1)
18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

v.

ROLANDO RAMIREZ,
RASHEED ALI, a/k/a “Fresh,” and
TAMRAT MASON, a/k/a “Shifta,”

Defendants.



SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

Solicitation to Commit a Crime of Violence
18 U.S.C. § 373

Beginning in or around 2017, the exact date being unknown to the Grand Jury, and continuing through and including on or about August 27, 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ROLANDO RAMIREZ
and
RASHEED ALI, a/k/a “Fresh,”

with intent that another person engage in conduct constituting a felony that has an element the use,

attempted use, and threatened use of physical force against property and against the person of another in violation of the laws of the United States, to wit, the crime charged in Count 2 as charged in this Superseding Indictment, and under circumstances strongly corroborative of that intent, solicited, commanded, induced, and otherwise endeavored to persuade such other persons to engage in such conduct, in violation of Title 18, United States Code, Section 373.

COUNT 2
Interstate Stalking
18 U.S.C. § 2261A(1)

From on or about August 20, 2019, continuing through on or about August 27, 2019, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

ROLANDO RAMIREZ
and
RASHEED ALI, a/k/a “Fresh,”

did willfully induce and procure Jaime Serrano and Julian Jimenez to travel in interstate commerce, that is, from the State of New York to the State of Florida, with the intent to kill, injure, harass, and intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, that is, Victim 1, and in the course of, and as a result of, such travel engaged in conduct that placed Victim 1, his spouse, and an immediate family member of Victim 1, in reasonable fear of death and serious bodily injury to Victim 1, in violation of Title 18, United States Code, Sections 2261(A)(1)(A)(i-iii) and 2.

Pursuant to Title 18, United States Code, Section 2261(b)(3), it is further alleged that the defendants’ conduct resulted in serious bodily injury to Victim 1.

Pursuant to Title 18, United States Code, Section 2261(b)(3), it is further alleged that the defendants used a dangerous weapon during the offense.

COUNT 3
Conspiracy to Use and Carry a Firearm During a Crime of Violence
18 U.S.C. § 924(o)

Beginning in or around 2017, the exact date being unknown to the Grand Jury, and continuing through and including on or about August 27, 2019, in Miami-Dade County, in the Southern District of Florida and elsewhere, the defendants,

ROLANDO RAMIREZ
and
RASHEED ALI, a/k/a “Fresh,”

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to use and carry a firearm during and in relation to a crime of violence, and to possess a firearm in furtherance of a crime of violence, an offense for which the defendants may be prosecuted in a court of the United States, that is a violation of Title 18, United States Code, Section 2261A(1), as charged in Count 2 of this Superseding Indictment, in violation of Title 18 United States Code, Section 924(c)(1)(A); all in violation of Title 18, United States Code, Section 924(o).

COUNT 4
Discharging a Firearm in Furtherance of a Crime of Violence
18 U.S.C. § 924(c)(1)(A)(iii)

Between on or about August 24, 2019, and continuing through on or about August 27, 2019, in Miami-Dade County, in the Southern District of Florida, the defendants,

ROLANDO RAMIREZ
and
RASHEED ALI, a/k/a “Fresh,”

did knowingly use and carry a firearm during and in relation to a crime of violence, and did knowingly possess a firearm in furtherance of a crime of violence, an offense for which the defendants may be prosecuted in a court of the United States, that is a violation of Title 18, United

States Code, Section 2261A(1), as charged in Count 2 of this Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

Pursuant to Title 18, United States Code, Section 924(c)(1)(A)(iii), it is further alleged that the firearm was discharged.

COUNT 5
Murder for Hire Conspiracy
18 U.S.C. § 1958

Beginning in or around 2017, the exact date being unknown to the Grand Jury, and continuing through and including on or about August 27, 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ROLANDO RAMIREZ
and
RASHEED ALI, a/k/a “Fresh,”

did knowingly and willfully conspire with each other and others known to the Grand Jury to use and cause another to use a facility of interstate and foreign commerce, with intent that the murder of Victim 1 be committed, in violation of laws of the State of Florida, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, in violation of Title 18, United States Code, Section 1958(a).

COUNT 6
Murder for Hire
18 U.S.C. § 1958

Beginning in or around 2017, the exact date being unknown to the Grand Jury, and continuing through and including on or about August 27, 2019, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ROLANDO RAMIREZ
and
RASHEED ALI, a/k/a “Fresh,”

did knowingly and intentionally use, and cause another to use, a facility of interstate and foreign commerce, with intent that the murder of Victim 1 be committed, in violation of the laws of the State of Florida, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, in violation of Title 18, United States Code, Sections 1958(a) and 2.

COUNT 7
Witness Tampering
18 U.S.C. § 1512(b)(3)

On or about August 10, 2022, and continuing through on or about December 9, 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ROLANDO RAMIREZ,
RASHEED ALI, a/k/a “Fresh,”
and
TAMRAT MASON, a/k/a “Shifta,”

did knowingly and corruptly persuade another person, and attempt to do so, and did engage in misleading conduct toward another person with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission or possible commission of a federal offense, in violation of Title 18, United States Code, Sections 1512(b)(3) and 2.

COUNT 8
Obstruction of Justice
18 U.S.C. § 1503(a)

On or about August 10, 2022, and continuing through on or about December 9, 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ROLANDO RAMIREZ,
RASHEED ALI, a/k/a “Fresh,”
and
TAMRAT MASON, a/k/a “Shifta,”

did corruptly influence, obstruct, and impede, and endeavor to influence, obstruct, and impede, the due and proper administration of justice, as set forth in United States v. Rolando Ramirez et al., Case No. 24-CR-20341, by providing false information to agents of the Federal Bureau of Investigation for the purpose of obstructing an investigation into the attempted murder of Victim 1, in violation of Title 18, United States Code, Sections 1503 and 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Superseding Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **ROLANDO RAMIREZ, RASHEED ALI,** and **TAMRAT MASON,** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 924(c), or a conspiracy to commit a violation of Title 18, United States Code, Section 924(c), in violation of Title 18, United States Code, Section 924(o), or any other criminal law of the United States, as alleged in this Superseding Indictment, the defendant shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

3. Upon conviction of a violation or conspiracy to commit a violation of Title 18, United States Code, Section 1958, as alleged in this Superseding Indictment, the defendants shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924.


4. Upon conviction of a violation of Title 18, United States Code, Section 1503 and

1512, as alleged in this Superseding Indictment, the defendants shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code Sections 981(a)(1)(C) and 924(d)(1), and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON


HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY


ABBIE D. WAXMAN
ASSISTANT UNITED STATES ATTORNEY


MICHAEL E. GILFARB
ASSISTANT UNITED STATES ATTORNEY

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 24-CR-20341-ALTMAN(s)

v.

ROLANDO RAMIREZ, et al.,

CERTIFICATE OF TRIAL ATTORNEY

Defendants.

Court Division (select one)

- ☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

Superseding Case Information:

New Defendant(s) (Yes or No) NoNumber of New Defendants 0Total number of new counts 1

I do hereby certify that:

- I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
- Interpreter: (Yes or No) No
List language and/or dialect: _____
- This case will take 20 days for the parties to try.
- Please check appropriate category and type of offense listed below:
 (Check only one) (Check only one)
 I ☐ 0 to 5 days ☐ Petty
 II ☐ 6 to 10 days ☐ Minor
 III ☒ 11 to 20 days ☐ Misdemeanor
 IV ☐ 21 to 60 days ☒ Felony
 V ☐ 61 days and over
- Has this case been previously filed in this District Court? (Yes or No) Yes
If yes, Judge Roy K. Altman Case No. 24-CR-20341-ALTMAN
- Has a complaint been filed in this matter? (Yes or No) No
If yes, Judge _____ Magistrate Case No. _____
- Does this case relate to a previously filed matter in this District Court? (Yes or No) Yes
If yes, Judge Roy K. Altman Case No. 22-CR-20389-ALTMAN
- Defendant(s) in federal custody as of August 16, 2024
- Defendant(s) in state custody as of _____
- Rule 20 from the _____ District of _____
- Is this a potential death penalty case? (Yes or No) No
- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
- Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
- Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? Yes
- Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: 

ABBIE D. WAXMAN

Assistant United States Attorney

FL Bar No.

109315

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ROLANDO RAMIREZ

Case No: 24-CR-20341-ALTMAN(s)

Count #: 1

Solicitation to Commit a Crime of Violence

Title 18, United States Code, Section 373

*** Max. Term of Imprisonment: 20 years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

Count #: 2

Stalking

Title 18, United States Code, Section 2261A

*** Max. Term of Imprisonment: 10 years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

Count #: 3

Conspiracy to Use and Carry a Firearm During a Crime of Violence

Title 18, United States Code, Section 924(o)

*** Max. Term of Imprisonment: 20**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 4

Discharging a Firearm in Furtherance of a Crime of Violence

Title 18, United States Code, Section 924(c)(1)(A)(iii)

- * **Max. Term of Imprisonment: Life**
- * **Mandatory Min. Term of Imprisonment (if applicable): 10 years**
- * **Max. Supervised Release: 5 years**
- * **Max. Fine: \$250,000**

Count #: 5

Murder for Hire Conspiracy

Title 18, United States Code, Section 1958

- * **Max. Term of Imprisonment: Life**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: 5 years**
- * **Max. Fine: \$250,000**

Count #: 6

Murder for Hire

Title 18, United States Code, Section 1958

- * **Max. Term of Imprisonment: Life**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: 5 years**
- * **Max. Fine: \$250,000**

Count #: 7

Witness Tampering

Title 18, United States Code, Section 1512(b)(3)

- * **Max. Term of Imprisonment: 20 years**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: 3 years**
- * **Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 8

Obstruction of Justice

Title 18, United States Code, Section 1503(a)

* **Max. Term of Imprisonment: 10 years**

* **Mandatory Min. Term of Imprisonment (if applicable): N/A**

* **Max. Supervised Release: 3 years**

* **Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: RASHEED ALI

Case No: 24-CR-20341-ALTMAN(s)

Count #: 1

Solicitation to Commit a Crime of Violence

Title 18, United States Code, Section 373

*** Max. Term of Imprisonment: 20 years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

Count #: 2

Stalking

Title 18, United States Code, Section 2261A

*** Max. Term of Imprisonment: 10 years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

Count #: 3

Conspiracy to Use and Carry a Firearm During a Crime of Violence

Title 18, United States Code, Section 924(o)

*** Max. Term of Imprisonment: 20**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count #: 4

Discharging a Firearm in Furtherance of a Crime of Violence

Title 18, United States Code, Section 924(c)(1)(A)(iii)

- * **Max. Term of Imprisonment: Life**
- * **Mandatory Min. Term of Imprisonment (if applicable): 10 years**
- * **Max. Supervised Release: 5 years**
- * **Max. Fine: \$250,000**

Count #: 5

Murder for Hire Conspiracy

Title 18, United States Code, Section 1958

- * **Max. Term of Imprisonment: Life**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: 5 years**
- * **Max. Fine: \$250,000**

Count #: 6

Murder for Hire

Title 18, United States Code, Section 1958

- * **Max. Term of Imprisonment: Life**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: 5 years**
- * **Max. Fine: \$250,000**

Count #: 7

Witness Tampering

Title 18, United States Code, Section 1512(b)(3)

- * **Max. Term of Imprisonment: 20 years**
- * **Mandatory Min. Term of Imprisonment (if applicable): N/A**
- * **Max. Supervised Release: 3 years**
- * **Max. Fine: \$250,000**

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

Count #: 8

Obstruction of Justice

Title 18, United States Code, Section 1503(a)

*** Max. Term of Imprisonment: 10 years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 years**

*** Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TAMRAT MASON

Case No: 24-CR-20341-ALTMAN(s)

Count #: 7

Witness Tampering

Title 18, United States Code, Section 1512(b)(3)

* **Max. Term of Imprisonment: 20 years**

* **Mandatory Min. Term of Imprisonment (if applicable): N/A**

* **Max. Supervised Release: 3 years**

* **Max. Fine: \$250,000**

Count #: 8

Obstruction of Justice

Title 18, United States Code, Section 1503(a)

* **Max. Term of Imprisonment: 10 years**

* **Mandatory Min. Term of Imprisonment (if applicable): N/A**

* **Max. Supervised Release: 3 years**

* **Max. Fine: \$250,000**

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.